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June 15, 2021

VIA ECF

The Honorable Raymond J. Dearie
U.S. District Court – E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.*, No. 1:19-cv-02987(RJD)(RLM)

Dear Judge Dearie:

We represent Plaintiff Yelena Ruderman (“Plaintiff”) and write pursuant to Your Honor’s Individual Rules, Rule II (B) to respectfully request a brief, nine (9) business-day extension of time for Plaintiff to file her opposition to Defendants’ Motion for Summary Judgment, from Wednesday, June 23, 2021 to Tuesday, July 6, 2021.

Plaintiff respectfully submits that she needs the additional time to gather the evidence in opposition to Defendants’ motion, as well as to accurately apprise the Court of the myriad of disputed facts and evidence that warrant denial of summary judgment. This is the first request for an adjournment of this deadline. Plaintiff’s counsel conferred with counsel for Defendants who advised that Defendants consent to the requested adjournment and in turn requested that their Reply brief deadline be extended to July 30, 2021 – which Plaintiff consented to. As such, Plaintiff proposes the following revised schedule for the briefing of Defendants’ motion:

- Plaintiff’s opposition shall be due on July 6, 2021 (original date June 23, 2021).
- Defendants’ reply shall be due on July 30, 2021 (original date July 7, 2021).

Additionally, pursuant to Rule III (C), Plaintiff respectfully requests a 15-page enlargement to the page limits for her opposition brief. Plaintiff submits that the additional pages are necessary to properly present the relevant evidence showing the numerous material issues of fact in dispute in this matter. Indeed, Plaintiff submits that this case is riddled with questions of material fact and that virtually every single claim raised by Defendants is controverted by specific evidence in the record that must be demonstrated in Plaintiff’s opposition brief. This results in the need for additional pages to fully present the relevant evidence to oppose Defendants’ arguments.

Defendants do not consent to Plaintiff’s request for a page enlargement on the grounds that they did not request an enlargement in their moving papers. However, Defendants presented their arguments based on facts that they claimed were “undisputed.” Plaintiff must now cite to the record to specifically show how each such material fact is indeed “disputed.” Significantly more pages are needed to show that material issues are in dispute, rather than simply stating that such issues are undisputed. While Plaintiff will strive to be concise, Plaintiff submits that the additional 15 pages are necessary to fully defend against Defendants’ Motion for Summary Judgment. Further, as Plaintiff communicated to Defendants’ counsel, Plaintiff has no objection to Defendants also receiving a reasonable page enlargement for their Reply brief.



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We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Innessa M. Huot'.

Innessa M. Huot

Cc: Counsel of Record (*via* ECF)